

May 8, 2023

VIA ECFThe Honorable Sarah L. Cave  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1670  
New York, New York 10007

The letter-motion at ECF No. 686 to file documents under seal or with redactions is GRANTED. The documents at ECF No. 688 shall remain as only visible to the selected parties.

The Clerk of Court is respectfully directed to close ECF No. 686.

SO ORDERED. 05/09/23

  
SARAH L. CAVE  
United States Magistrate JudgeRe: *Monterey Bay Mil. Housing LLC v. Ambac Assurance Corp.*, Case No. 1:19 Civ. 09193  
(PGG) (SLC)

Dear Judge Cave:

Pursuant to Federal Rule of Civil Procedure 5.2(d), Rule I(G)(2) of Your Honor's Individual Practices, this Court's Standing Order No. 19-mc-583, and this Court's ECF Rules & Instructions ("ECF Rules"), Defendant Dan Ray respectfully submits this letter motion for approval of a sealed filing in connection with Mr. Ray's letter of today's date (the "Letter") joining in full the Jefferies Entities' motion seeking an order reopening Mark Connor's deposition and compelling him to answer questions as that he was improperly instructed not to answer (*see* ECF No. 669).

The Letter describes portions of testimony from Mr. Connor's April 24, 2023 deposition, which is provisionally designated "Confidential" pursuant to the Stipulated Protective Order in this case (ECF No. 135, the "Protective Order"). The Letter also describes portions of Plaintiffs' privilege log, copies of which Plaintiffs have previously filed under seal. Finally, the Letter describes personal and confidential information contained in the exhibit attached to the letter, as described below.

The Letter attaches a redacted copy of Mr. Ray's Verizon cell phone bill (the "Exhibit"). Mr. Ray has redacted portions of the Exhibit that contain personal and confidential information entirely unrelated to this litigation, i.e., personal phone records and amounts paid for telephone services, and Bates numbering from an entirely unrelated action. Mr. Ray has sought to seal that redacted exhibit because the relevant, unredacted portions contain additional sensitive personal information—Mr. Ray's personal phone number and Mr. Connor's phone number.

Accordingly, Mr. Ray respectfully requests the Court's permission to file his Letter and Attachment under seal with the viewing level "Selected Parties." Consistent with the ECF Rules, a redacted version of the Letter will also be filed on the public docket.

Respectfully submitted,

/s/ Reed Brodsky  
Reed Brodsky

Cc: All Counsel of Record (by ECF)